

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
PETER MAGGIO, et al,)
CR. NO. 04-10231-MLW)

**CONDITIONAL ASSENTED-TO MOTION TO FURTHER EXTEND THE TIME
FOR DEFENDANT PARADISO TO FILE PROPOSED *VOIR DIRE* QUESTIONS,
PROPOSED JURY INSTRUCTIONS AND MOTION *IN LIMINE***

Defendant, Louis Paradiso, by and through his attorney, Scott P. Lopez, hereby moves to extend the time to file his proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda for an additional eleven (11) days from April 10, 2006 until today, April 21, 2006.

In support of this motion, undersigned counsel states the following:

1. On March 24, 2006, undersigned counsel filed a motion to extend time to file his proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda from March 24, 2006 until April 10, 2006 because he was engaged in preparing for a trial before the Court in *United States v. Antoin Quarles Combs*, Criminal Number 05-10237-MLW.

2. Undersigned counsel received electronic notice that his initial motion to extend time was allowed by the Court on April 14, 2006.

3. Unfortunately, in the interim, undersigned counsel's other professional and personal responsibilities prevented undersigned counsel from filing the above-referenced materials.

4. However, undersigned counsel has filed the above materials yesterday and today.

5. Since the trial in this matter is not scheduled to start until June 5, 2006, and the government will have ample time to object to defendant's submissions, undersigned counsel prays that the Court will exercise its discretion and allow this motion.

6. Finally, the government assents to this motion so long as the Court will permit the government an additional seven (7) days to file responses to defendant's motions *in limine* and to submit any additional jury instructions the government deems necessary, to which defendant has no objection.

WHEREFORE, defendant Louis Paradiso respectfully requests the Court to grant this motion and further extend the time for filing his proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda for an additional eleven (11) days from April 10, 2006 until today, April 21, 2006.

Respectfully submitted
By Defendant,
LOUIS A. PARADISO
By his attorney

/s/ Scott P. Lopez
Scott P. Lopez, BBO # 549556
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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred with counsel for the government, Assistant U.S. Attorney Victor Wild, by telephone today, in a good faith attempt to resolve or narrow the issue in this motion.

/s/ Scott P. Lopez
Scott P. Lopez

CERTIFICATE OF SERVICE

I, Scott P. Lopez, hereby certify that on the 21st day of April, 2006, I served the within MOTION TO FURTHER EXTEND THE TIME FOR DEFENDANT PARADISO TO FILE PROPOSED VOIR DIRE QUESTIONS, PROPOSED JURY INSTRUCTIONS AND MOTION *IN LIMINE* by electronic mail on the following counsel of record at the following address:

Victor Wild
Assistant United States Attorney
United States Attorney Office
One Courthouse Way, Suite 9200
Boston, MA 02210
617-748-3100
Victor.Wild@usdoj.gov

/s/ Scott P. Lopez
Scott P. Lopez